

CUAUHTEMOC ORTEGA (Bar No. 257443)
Federal Public Defender
ERIN M. MURPHY (Bar No. 285087)
(E-Mail: erin_murphy@fd.org.org)
JULIA DEIXLER (Bar No. 301954)
(E-Mail: julia_deixler@fd.org)
Deputy Federal Public Defenders
321 East 2nd Street
Los Angeles, California 90012-4202
Telephone: (213) 894-2854
Facsimile: (213) 894-0081

Attorneys for Defendant
ROBERT RUNDO

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT RUNDO,

Defendant.

Case No. CR 18-759-CJC

**STIPULATION TO CONINUE
PRETRIAL BRIEFING SCHEDULE**

Motions Hearing: February 26, 2024

Pretrial Conference: March 18, 2024

Trial Date: March 26, 2024

Defendant Robert Rundo, through his attorneys of record, Deputy Federal Public Defenders Erin Murphy and Julia Deixler, Defendant Robert Boman, through his attorney of record Peter Swarth, and Plaintiff United States of America, through its attorneys of record, Assistant United States Attorneys Solomon Kim and Kathrynne Seiden, hereby stipulate and agree as follows:

//

//

//

1 1. Trial in this matter is scheduled for March 26, 2024.

2 2. This Court previously ordered the following briefing schedule for
3 dispositive motions (including any motion to dismiss or motion to suppress):

- 4 a. Motions due: January 8
5 b. Oppositions due: January 29
6 c. Replies due: February 5
7 d. Hearing: February 26

8 3. By this stipulation, the parties request a one-week continuance to the
9 current deadline for dispositive motions, with the following modified schedule:

- 10 a. Motions due: January 15
11 b. Oppositions due: February 5
12 c. Replies due: February 12
13 d. Hearing: February 26

14 4. The defense for Mr. Rundo requests the modification because one of Mr.
15 Rundo's defense attorneys recently suffered a death in the family and has taken an
16 unexpected leave of absence to deal with this family emergency. Defense counsel for
17 Mr. Rundo therefore represents that it requires additional time to research, draft, and
18 finalize any dispositive motions be filed on behalf of Mr. Rundo.

19 5. Counsel for Mr. Boman and counsel for the government concur in this
20 stipulation.

21 6. For the foregoing reasons, the parties request that the Court modify the
22 briefing schedule for dispositive motions as identified above.

23

24 IT IS SO STIPULATED.

25 //

26 //

27 //

28

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: Deceber 27, 2023

By */s/ Julia Deixler*

ERIN MURPHY
JULIA DEIXLER
Deputy Federal Public Defenders
Attorneys for ROBERT RUNDO

DATED: Deceber 27, 2023

By */s/ per email authorization*

PETER SWARTH
Attorney for ROBERT BOMAN

E. MARTIN ESTRADA
United States Attorney

DATED: Deceber 27, 2023

By */s/ per email authorization*

SOLOMON KIM
KATHRYNNE SEIDEN
Assistant United States Attorneys
Attorneys for UNITED STATES OF AMERICA